

Gabriel Froymovich
17470 Healdsburg Ave
Healdsburg, CA 95448
Tel: 317-414-3421
froymovichg@sbcglobal.net

Pro Se, claims 7955 and 96978

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC
COMPANY,

) Bankruptcy Case No. 19-30088 (DM)

) Chapter 11

) (Lead Case)(Jointly Administered)

) **DECLARATION OF GABRIEL
FROYMOVICH IN SUPPORT OF
RESPONSE TO THE REORGANIZED
DEBTORS' ONE HUNDRED
NINETEENTH OMNIBUS OBJECTION
TO CLAIMS (NO LIABILITY CLAIMS)**

1
2 I, Gabriel Froymovich, pursuant to Section 1746 of Title 28 of the United States Code,
3 hereby declare under penalty of perjury that the following is true and correct to the best of my
4 knowledge, information and belief:

- 5 1. I reside at 17470 Healdsburg Ave, Healdsburg, CA and manage and am an owner of the
6 properties whose addresses are 17470 Healdsburg Ave, Healdsburg, CA and 17492,
7 Healdsburg, CA. I submit this Declaration in support of my own *Response to the*
8 *Reorganized Debtors' One Hundred Nineteenth Omnibus Objection to Claims (No*
9 *Liability Claims)* (the “**Objection**”), submitted contemporaneously herewith.
- 10 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
11 my personal knowledge, information personally represented by others to me and
12 information provided by the various entities related to the provision of utility services to
13 the addresses mentioned above. If called upon to testify, I would testify competently to
14 the facts set forth in this Declaration and, furthermore, to provide evidence of such facts.
- 15 3. The statements, claims and assertions made by myself in the attached response to the
16 Objection can be supported by evidence. Witnesses, including myself, neighbors,
17 firefighters and PG&E personnel could support the claims. In addition, photographs of
18 physical evidence may be available. Furthermore, documentation by contractors;
19 communications between myself and PG&E; and bank records could further substantiate
20 my claims.
- 21 4. The Reorganized Debtors claim that they conducted a thorough review of the relevant
22 Proof of Claims. No representatives of the Reorganized Debtors contacted me to request
23 information regarding the above-enumerated claims. Having failed to even make a phone
24 call to the claimant, it seems an overstatement to characterize their review as thorough.
- 25 5. I did my best to use the rigidly presented Proof of Claims and Information Requests. To
26 any extent that I did not provide PG&E with enough proof to meet their standards, I
27 would note that their forms are not necessarily sufficient to understand the claim; that I
28 did communicate with them extensively through other channels and provided physical
and other evidence and assumed this would be accounted for; and that at no point was

1 any indication made that I would not have further opportunity to provide evidence to
2 PG&E or the Court.

3 6. I have made multiple attempts to resolve this issue outside of Court but have largely been
4 ignored by PG&E and have never had the opportunity to speak with someone with the
5 authority to resolve the case, nor to narrow the issues before this Court.

6 7. I received and deposited a check from PG&E, but specifically stated that I did not
7 consider this to be full restitution, but instead expected, as agreed by PG&E personnel
8 that additional restitution would be made, in the form of actions to mitigate the damage
9 done and future damage and/or additional monetary relief. I specifically stated that I
10 would not agree to sign anything indicating that this was sufficient recompense. In fact, I
11 have not signed any agreement not to pursue further relief. Additionally, as time has
12 gone on, PG&E's failure to live up to promises made to mitigate damage have led to
13 additional degradation in the value of and destruction of the properties mentioned above.

14 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
15 correct to the best of my knowledge, information, and belief. Executed this thirtieth day of
16 November, 2022.

17
18
19 

20 Gabriel Froymovich
21
22
23
24
25
26
27
28